



## Responsible Sourcing Policy

Metallic Resources, Inc. is aware of, actively supports, and is committed to the international efforts to investigate, monitor, and mitigate activities that contribute to illegal armed groups, human rights violations, or financial wrongdoings in Tin supply chains as defined in Annex II of the Organization of Economic Co-operation and Development Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict- Affected and High-Risk Areas Third Edition (OECD Guidance).

Metallic Resources respects the dignity and importance of human rights and considers any mineral that may pose risks of contributing to the harm listed in Annex II of OECD Guidelines to be conflict minerals. Metallic Resources will only purchase Tin-containing material from sources that have been verified as not involved with or contributing to activity defined in Annex II of the OECD Guidance; specifically:

- Serious human right abuses associated with the extraction, transport, or trade of minerals:
  - Any forms of torture, cruel, inhuman, and degrading treatment
  - Any forms of forced or compulsory labor
  - The worst forms of child labor
  - Other gross human rights violations and abuses such as widespread sexual violence
  - War crimes or other serious violations of international humanitarian law, crimes against humanity or genocide
- Direct or indirect support to non-state armed groups, or to public or private security forces
- Bribery and fraudulent misrepresentation of the origin of minerals
- Money laundering or nonpayment of taxes, fees, and royalties to government

In support of Annex II of the OECD Guidance, Metallic Resources will:

- Train and direct all relevant Metallic Resources staff members on procedures related to responsible sourcing due diligence system.
- Exercise due diligence with relevant suppliers consistent with the OECD Guidance and the Responsible Business Alliance's Responsible Minerals Assurance Process (RMAP) and encourage our suppliers to do the same.
- Provide and expect our suppliers to cooperate in providing due diligence information to confirm tin containing material in our supply chain does not contribute to illegal armed groups, human rights violations, or financial wrongdoings as defined in Annex II of OECD Guidance.
- Implement with suppliers who pose a reasonable risk to be supporting conflict, human rights violations, or government corruption, a risk mitigation strategy, including:
  - Continue engagement with the supplier during risk management efforts
  - Temporarily suspend supplier sourcing while pursuing ongoing mitigation
  - Discontinue engagement where mitigation appears unacceptable
- Complete an annual RMAP review and participate in an assessment conducted by a third-party auditing firm every three years to examine whether Metallic Resources has implemented a due diligence management system that supports the OECD Guidance.
- Commit to transparency in the implementation of this policy by making available reports on our progress to our customers, relevant stakeholders (as requested).

**By supplying Metallic Resources with Tin-containing material, you and your company explicitly agree to the terms of this Responsible Sourcing Policy. In the event that you and your company do not agree to the terms of this Responsible Sourcing Policy, you are required to notify us in writing – at which point Metallic Resources will no longer source Tin-containing material from you and your company. Absent hearing from you, however, this Responsible Sourcing Policy will remain part of the parties’ contract.**

Any concerns about our sourcing policy or due diligence system can be reported through Responsible Business Alliance (RBA) Voices using Metallic Resources’ factory specific QR code. The Voices platform is a grievance mechanism using mobile and web technologies with a category specific to Mineral Supply Chain Issues. Scan the QR code and navigate to the website to begin the grievance process.



Stanley Rothschild, President

Metallic Resources, Inc.